



THE COCA-COLA COMPANY
FAMILY FEDERAL
CREDIT UNION

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October 29, 2007

Via Overnight Mail

Mary Rupp, Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314-3428

Re: Comments on Advanced Notice of Proposed Rule (ANPR) for
Parts 703 and 704

Dear Ms. Rupp:

On behalf of The Coca-Cola Company Family Federal Credit Union, I am responding to the National Credit Union Administration's (NCUA) request for comment regarding permissible foreign currency investments. The Coca-Cola Company Family FCU greatly appreciates NCUA's willingness to consider expanded investment authorities with the hope of allowing credit unions the opportunity to offer foreign currency denominated products and services to its members. While we have no immediate plans to offer such products and services to our members, we can envision a time where our members would greatly benefit from foreign currency denominated products and services; therefore we would like to reserve the option of providing them in the future.

While we have not fully considered all aspects of the ANPR at this time we feel strongly that the Board should consider the following:

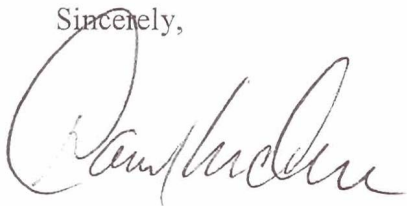
Foreign currency investments made thru U.S. domicile banks would limit investments both on the availability and interest rate risk. On the availability side by limiting investment to U.S. domicile banks the investing credit union may find limited options depending on the country of origin. By including foreign domicile banks the availability of investment options would provide additional diversity and limit the concentration of risk. On the interest rate risk side a U.S. domicile bank does not provide any less risk to foreign currency fluctuations and in fact may cause additional interest rate risk since they are intermediately in the conversion process. It is our opinion that foreign currency investments in a U.S. domiciled bank do not necessarily limit the sovereign risk associated with each individual country.

- Determine the merits of lending in foreign denominated currencies in conjunction with the proposed rule of foreign currency denominated investments. It is our view that for a credit union to offer products or services that are foreign currency denominated in a safe and sound manner, any authorities granted to invest in foreign currency must be complimented with the ability to lend in foreign currency. The reasoning behind the need for enhanced investment authorities is to enable a credit union to effectively hedge against the risk of currency fluctuations. The most natural hedge against such risk is the ability to match the book of business through a balanced approach of equal amounts of shares and loans in a given currency. This acts as a natural hedge against currency fluctuation risk. We are of the opinion that this natural hedge clearly provides the most effective first line of defense against currency fluctuations risk in these types of situations.

Moreover, it is generally accepted that the organic purpose of credit unions is to accept shares and make loans as well. NCUA has already recognized the providence of allowing credit unions to accept share deposits in a foreign currency as illustrated in the recently amended share insurance regulation found in Part 745.7 of NCUA Rules and Regulations. To promulgate a regulation that would prohibit a credit union's ability to make loans to its members would be inconsistent with one of our primary purposes for existing. Therefore in keeping with solid principles of safety and soundness and our primary purpose, we would strongly encourage the Board to also consider granting a credit union the ability to lend to its members in foreign currency, as well as to accept deposits.

The Coca-Cola Company Family FCU appreciates the opportunity to comment on this important subject. We readily recognize there are a limited number of credit unions who will take advantage of the ability to offer foreign currency denominated products and services to their members however, we are convinced that the authorities contemplated in the ANPR will have a profoundly positive affect and will enable credit unions to better serve the financial needs of their members.

Sincerely,



Daniel McCue
President